

JOSEPH H. HUNT  
Assistant Attorney General  
CARLOTTA P. WELLS  
Assistant Director, Federal Programs Branch  
CAROL FEDERIGHI  
Senior Trial Counsel  
United States Department of Justice  
Civil Division, Federal Programs Branch  
P.O. Box 883  
Washington, DC 20044  
Tel.: (202) 514-1903  
Email: carol.federighi@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

**STATE OF CALIFORNIA, by and through  
Attorney General Xavier Becerra;  
COUNTY OF LOS ANGELES; CITY OF  
LOS ANGELES; CITY OF FREMONT;  
CITY OF LONG BEACH; CITY OF  
OAKLAND; CITY OF STOCKTON,**

Plaintiffs,

**v.**

**WILBUR L. ROSS, JR., in his official  
capacity as Secretary of the U.S.  
Department of Commerce; U.S.  
DEPARTMENT OF COMMERCE; DR.  
STEVEN DILLINGHAM, in his official  
capacity as Director of the U.S. Census  
Bureau; U.S. CENSUS BUREAU; DOES 1-  
100,**

Defendants.

No. 3:18-cv-01865-RS

**STIPULATION TO FURTHER  
ENLARGE TIME RE: ATTORNEYS'  
FEES AND COSTS; ~~PROPOSED~~  
ORDER**

Dept: 3  
Judge: The Honorable Richard G.  
Seeborg  
Trial Date: January 7, 2019  
Action Filed: March 26, 2018

1 Plaintiff State of California, Plaintiff-in-Intervention Los Angeles Unified School District  
2 (LAUSD and, collectively, “Plaintiffs”), and Defendants Wilbur L. Ross, Jr., U.S. Department of  
3 Commerce, Dr. Steven Dillingham, and U.S. Census Bureau (collectively, “Defendants,” and  
4 together with Plaintiffs, the “Parties”), by and through their respective attorneys of record,  
5 stipulate as follows:

6 1. Following entrance of the initial judgment in this case, the Parties stipulated, and  
7 this Court ordered, that Plaintiffs’ deadline to file any motion for attorneys’ fees or bill of costs  
8 was extended until after Defendants’ appeal was resolved and a final judgment was entered. *See*  
9 ECF Nos. 212, 213.

10 2. This Court entered Final Judgment After Remand, Order of Vacatur, and  
11 Permanent Injunction on August 1, 2019. Pursuant to the previous stipulation and order, the  
12 deadline to file a motion for attorneys’ fees was then September 3, 2019. *Id.*

13 3. Plaintiff State of California and Plaintiff-in-Intervention LAUSD filed their bills of  
14 costs on August 15 and 16, 2019, respectively. ECF Nos. 241, 243. Defendants’ deadlines to file  
15 objections to the bills of costs were initially August 29 and 30, 2019. *See* Local Rule 54-2.

16 4. Pursuant to a prior Stipulation filed by the parties on August 27, 2019 (ECF No.  
17 244), the Court extended Plaintiffs’ deadline to file any motion for attorneys’ fees and  
18 Defendants’ deadlines to file any objections to September 13, 2019, to allow the Parties to discuss  
19 the possibility of settlement on the issues of attorneys’ fees and costs.

20 4. The Parties are committed to discussing settlement but have not yet had sufficient  
21 time to reach agreement. In order to permit full and meaningful negotiations, the Parties therefore  
22 jointly request a further fourteen-day extension to September 27, 2019, for: 1) the deadline to file  
23 any motion for attorneys’ fees; and 2) the deadline to file objections to Plaintiffs’ filed bills of  
24 costs.

25 5. This requested time modification would not have any effect on the schedule for  
26 this case, other than slightly delaying any potential attorneys’ fees and costs proceedings.  
27  
28

1 **IT IS SO STIPULATED.**

2 Dated: September 11, 2019

XAVIER BECERRA  
Attorney General of California  
ANTHONY R. HAKI  
Supervising Deputy Attorney General  
GABRIELLE D. BOUTIN  
Deputy Attorney General

/s/ R. Matthew Wise

R. MATTHEW WISE  
Deputy Attorney General

*Attorneys for Plaintiff State of California, by and  
through Attorney General Xavier Becerra*

9 Dated: September 11, 2019

DANNIS WOLIVER KELLEY  
SUE ANN SALMON EVANS  
KEITH A. YEOMANS

/s/ Keith A Yeomans

Keith A. Yeomans

*Attorneys for Plaintiff-Intervenor Los Angeles  
Unified School District*

15 Dated: September 11, 2019

JOSEPH H. HUNT  
Assistant Attorney General

CARLOTTA P. WELLS  
Assistant Branch Director

/s/ Carol Federighi

CAROL FEDERIGHI  
Senior Trial Counsel  
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Washington, DC 20044  
Phone: (202) 514-1903  
Email: carol.federighi@usdoj.gov

*Attorneys for Defendants*

**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of this document has been obtained from all signatories above.

Dated: September 11, 2019

/s/ Carol Federighi  
CAROL FEDERIGHI

~~PROPOSED~~ ORDER

**PURSUANT TO STIPULATION,**

Upon consideration thereof, and good cause appearing, it is hereby ORDERED that the deadline to file any motion for attorneys' fees and the deadlines to file any objections to Plaintiffs' filed bills of costs (ECF Nos. 241 and 243) are hereby extended to September 27, 2019.

**IT IS SO ORDERED.**

DATED: September 11, 2019

  
\_\_\_\_\_  
HON. RICHARD SEEBORG  
United States District Court Judge